

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

FILED
RICHARD W. NAGEL
CLERK OF COURT

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U.S. DISTRICT COURT
SOUTHERN DIST OHIO
WEST DIV CINCINNATI

UNITED STATES OF AMERICA,

Plaintiff,

vs.

QUIANA CAMPBELL,

Defendant.

CASE NO.

1:20CR 035

JUDGE J. BARRETT

INDICTMENT

18 U.S.C. § 1001(a)(2)

26 U.S.C. § 7206(1)

FORFEITURE ALLEGATION

THE GRAND JURY CHARGES:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment:

1. From in or about at least 2008, through and including the present, the defendant, **QUIANA CAMPBELL**, has been employed as a police officer with the Cincinnati Police Department, within the Southern District of Ohio.

2. Over the course of her more than 10-year term of employment, the defendant, **QUIANA CAMPBELL**, received training on the policies and procedures of the Cincinnati Police Department. At the time of her commission, the defendant, **QUIANA CAMPBELL**, took an oath to uphold the United States Constitution, as well as the constitution and laws of the State of Ohio.

3. As an officer with the Cincinnati Police Department, the defendant, **QUIANA CAMPBELL**, would be privy to significant information regarding enforcement activities

occurring in and around the City of Cincinnati which law enforcement is authorized by the laws of the State of Ohio to conduct, among other things, enforcement actions for liquor and solicitation offenses, searches and seizures, and arrests.

4. From in or about at least 2015, through and including 2017, as secondary employment, the defendant, **QUIANA CAMPBELL**, also performed off-duty detail duties for various local businesses within the Southern District of Ohio.

5. From in or about at least 2015 through and including 2017, the defendant, **QUIANA CAMPBELL**, was paid separately and apart from the Cincinnati Police Department for her off-duty detail work, specifically receiving her income directly from the business(es) to which she performed the work.

COUNT 1

(Making and Subscribing a False Return, Statement, or Other Document)

Paragraphs 1–5 of the Introductory Allegations of this Indictment are re-alleged and incorporated here.

That on or about February 7, 2018, in the Southern District of Ohio, the defendant, **QUIANA CAMPBELL**, a resident of Cincinnati, Ohio, did willfully make and subscribe a Form 1040, U.S. Individual Income Tax Return for 2017, which was verified by a written declaration that it was made under the penalties of perjury and which **QUIANA CAMPBELL** did not believe to be true and correct as to every material matter. Specifically, that Form 1040, U.S. Individual Income Tax Return for 2017, DLN: 70221-438-66046-8, which was filed electronically with the Director, Internal Revenue Service, from Cincinnati, Ohio, claiming that **QUIANA CAMPBELL** was owing a tax refund of \$6,377 is based on an omission of \$24,250 income earned while working

off-duty details and, therefore, Line 22 of the Form 1040, U.S. Individual Income Tax Return for 2017, DLN: 70221-438-66046-8, showing an income of \$50,707 is not true and correct.

In violation of Title 26, United States Code, Section 7206(1).

COUNT 2

(Making and Subscribing a False Return, Statement, or Other Document)

Paragraphs 1–5 of the Introductory Allegations of this Indictment are re-alleged and incorporated here.

That on or about March 7, 2017, in the Southern District of Ohio, the defendant, **QUIANA CAMPBELL**, a resident of Cincinnati, Ohio, did willfully make and subscribe a Form 1040, U.S. Individual Income Tax Return for 2016, which was verified by a written declaration that it was made under the penalties of perjury and which **QUIANA CAMPBELL** did not believe to be true and correct as to every material matter. Specifically, that Form 1040, U.S. Individual Income Tax Return for 2016, DLN: 70221-463-08146-7, which was filed electronically with the Director, Internal Revenue Service from Cincinnati, Ohio, claiming that **QUIANA CAMPBELL** was owing a tax refund of \$5,979 is based on an omission of \$18,232 income earned while working off-duty details and, therefore, Line 22 of the Form 1040, U.S. Individual Income Tax Return for 2017, DLN: 70221-463-08146-7, showing an income of \$57,811 is not true and correct.

In violation of Title 26, United States Code, Section 7206(1).

COUNT 3

(Making and Subscribing a False Return, Statement, or Other Document)

Paragraphs 1–5 of the Introductory Allegations of this Indictment are re-alleged and

incorporated here.

That on or about February 14, 2016, in the Southern District of Ohio, the defendant, **QUIANA CAMPBELL**, a resident of Cincinnati, Ohio, did willfully make and subscribe a Form 1040, U.S. Individual Income Tax Return for 2015, which was verified by a written declaration that it was made under the penalties of perjury and which **QUIANA CAMPBELL** did not believe to be true and correct as to every material matter. Specifically, that Form 1040, U.S. Individual Income Tax Return for 2015, DLN: 70211-445-24027-6, which was filed electronically with the Director, Internal Revenue Service, from Cincinnati, Ohio, claiming that **QUIANA CAMPBELL** was owing a tax refund of \$9,413 is based on an omission of \$17,632 income earned while working off-duty details and, therefore, Line 22 of the Form 1040, U.S. Individual Income Tax Return for 2015, DLN: 70211-445-24027-6, showing an income of \$52,229 is not true and correct.

In violation of Title 26, United States Code, Section 7206(1).

COUNT 4

(False Statement or Representation Made to a Department or Agency of the United States)

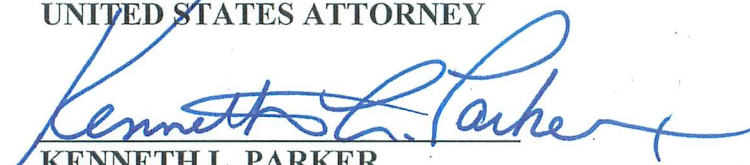
Paragraphs 1–5 of the Introductory Allegations of this Indictment are re-alleged and incorporated here.


On or about November 26, 2018, the defendant, **QUIANA CAMPBELL**, in the Southern District of Ohio, did willfully and knowingly make a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by denying to agents of the United States Treasury Department Internal Revenue Service, Criminal Investigation (IRSCI) that the owner of a nightclub had ever

contacted **QUIANA CAMPBELL** via text message asking whether an individual was an officer with the Cincinnati Police Department. The statement and representation was false because **QUIANA CAMPBELL** then and there knew she and the owner of the nightclub had communicated with the owner specifically inquiring about the police officer to which **QUIANA CAMPBELL** confirmed that the individual was in fact an officer. Specifically, on January 26, 2015, an owner of a nightclub in Cincinnati sent a text message to **QUIANA CAMPBELL** on her cellular phone asking who an individual was and if the individual was an undercover (officer). **QUIANA CAMPBELL** responded to the inquiry stating, "She's an officer...."

All in violation of 18 U.S.C. § 1001(a)(2).

DAVID M. DEVILLERS
UNITED STATES ATTORNEY


KENNETH L. PARKER
ASSISTANT UNITED STATES ATTORNEY

A TRUE BILL

Grand Jury Foreperson